

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION – CLEVELAND

IN RE:) CASE NO. 20-10986
)
Shannon Day Hill) CHAPTER 13
)
Debtor) JUDGE Jessica Price Smith
)
) **RESPONSE TO DEBTORS' OBJECTION TO**
) **PROOF OF CLAIM FILED BY PORTFOLIO**
) **RECOVERY ASSOCIATES, LLC ("PRA"), BY**
) **AND THOROUGH ITS SERVICING AGENT,**
) **PRA RECEIVABLES MANAGEMENT, LLC**

Creditor, Portfolio Recovery Associates, LLC, ("PRA"), by and through its servicing agent, PRA Receivables Management, LLC, by and through counsel, hereby responds to Debtor's Objection to Proof of Claim and states the following:

1. Creditor filed Proof of Claim 8-1 based on the judgment Creditor obtained against Debtor on August 28, 2019 in Ohio Common Pleas Court in Lorain County, Ohio, Case No. 19CV197267.

2. Creditor acknowledges that the Judgment is unsecured and that Claim 8-1 was mistakenly labeled secured when Claim 8-1 should have been unsecured.

3. Creditor's filed Claim 8-1 should not be disallowed and expunged from the within bankruptcy filing and instead allowed and paid as a general unsecured claim.

WEREFORE, Creditor prays that this Court allow Creditor's Proof of Claim in the Amount of \$8,293.00 to be paid as a general unsecured claim.

Respectfully submitted,

/s/ Richard J. LaCivita

Reimer Law Co.

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BY: Katherine D. Carpenter #0096867

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CERTIFICATE OF SERVICE

I certify that on December 4, 2020, a true and correct copy of the Response was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

1. Office of the U.S. Trustee at (registered address)@usdoj.gov
2. Lauren A. Helbling on behalf of the Chapter 13 Trustee's office at ch13trustee@ch13cleve.com
3. William Balena, Esq. on behalf of Shannon Day Hill, Debtor, at docket@ohbksource.com

And by regular U.S. mail, postage prepaid, to:

1. Shannon Day Hill, Debtor
264 Northfield Drive
Elyria, OH 44035

/s/ Richard J. LaCivita
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